

Defendants' Schedule (2)(i)(iii)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CORPORAL TRINIDAD NAVARRO,	:	
	:	
Plaintiff,	:	C.A. No. 05-565 GMS
	:	
v.	:	JURY TRIAL DEMANDED
	:	
CHRISTOPHER A. COONS,	:	
individually and in his official capacity;	:	
GUY H. SAPP, individually and in his	:	
official capacity; and NEW CASTLE	:	
COUNTY, a municipal corporation,	:	
	:	
Defendants.	:	

DEFENDANT'S PROPOSED ADDITIONAL JURY VOIR DIRE

Defendants respectfully request that the Court propound the following questions to the jury pool in the above matter:

1. Have you ever filed a complaint against a government entity?
2. Do you have any bias or prejudice against New Castle County or any of its agents or employees?
3. Has anyone or has any member of your family ever been in a situation where you or a family member believed that an employer violated your/their constitutional rights, namely, the right to freedom of speech under the First Amendment?
4. Has anyone or has any member of your family ever been in a situation where you or a family member believed you/they were retaliated against for exercising

your/their right to freedom of speech under the First Amendment or for exercising any other constitutional right?

5. Has anyone or any member of your family ever been employed in a capacity as a public official or in public administration, such as in city or county management type work? If so, when and where? Explain the nature of the duties.

6. Has anyone or a member of your family ever been employed in a personnel or human resources department in either a business or in government? When? Explain what you did. If so, when and where? Explain the nature of the duties.

7. Have you been exposed to any newspaper, radio or television accounts of this case or other lawsuits involving New Castle County?

8. Has anyone discussed with you, or attempted to discuss with you, this case or other lawsuits involving New Castle County?

9. Are you aware of any statements made by the lawyer for the plaintiff in this case, Jeffrey K. Martin, Esquire, regarding this litigation or any of the defendants?